

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**JUSTIN SAMUELS,**

Plaintiff,

v.

**BARNARD COLLEGE,**

Defendant.

**Case No.: 1:23-CV-06181 (PAE) (SLC)**

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**PLAINTIFF'S CASE REPORT AND PROPOSED DISCOVERY SCHEDULE**

**I. Summary of Claims**

Plaintiff, Justin Samuels, asserts claims of retaliation under:

- **Title IX of the Education Amendments of 1972**
- **New York State Human Rights Law (NYSHRL)**
- **New York City Human Rights Law (NYCHRL)**

Plaintiff alleges that Barnard College engaged in retaliatory conduct following prior complaints about its discriminatory practices. The specific acts of retaliation include:

1. **Failure to Provide Fee Waiver:** Plaintiff requested a fee waiver on December 4, 2023, which Barnard College ignored. Plaintiff was never informed of a December 1, 2023, deadline for waivers, and no such deadline was mentioned on the FilmFreeway submission platform.
2. **Discriminatory Policies:** After a prior complaint led to partial access to Athena Center programs for men, Barnard College backtracked by restricting the short film program to Black and Native women only, a violation of Title IX that led to an OCR complaint.

Barnard College failed to communicate with Plaintiff regarding the fee waiver request, which constitutes retaliation for his previous Title IX and OCR complaints.

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**II. Proposed Discovery Schedule**

**A. Discovery Timeline**

- **Initial Document Requests:** March 7, 2025

- **Third-Party Subpoenas (if needed):** March 21, 2025
- **Depositions (maximum of 3 per party):** July 11, 2025
- **Completion of All Discovery:** August 30, 2025

## **B. Depositions**

Plaintiff intends to depose the following individuals:

1. **Representative(s) from Barnard College** who handled Plaintiff's fee waiver request
2. **Athena Film Festival Selection Committee Members** involved in Plaintiff's submission review
3. **Barnard College Administrators** responsible for Athena Center program policies

## **C. Expert Testimony**

Plaintiff reserves the right to introduce expert testimony on:

- **Retaliation under Title IX**
- **Discriminatory institutional practices**

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## **III. Early Settlement or Resolution**

Plaintiff is open to early settlement discussions. Plaintiff proposes a settlement conference by **May 21, 2025**, to discuss potential resolution.

Plaintiff seeks the following information before settlement discussions:

1. **Barnard College's internal communications** regarding Plaintiff's fee waiver request
2. **Athena Film Festival selection criteria** and rubric used for script evaluations
3. **Records of prior OCR complaints** against Barnard College related to gender discrimination

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## **IV. Additional Matters**

Plaintiff requests the Court's assistance in compelling Barnard College to produce documents related to its Title IX compliance policies and prior complaints.

Respectfully submitted,

**Dated:** February 3, 2025  
**Justin Samuels, Pro Se Plaintiff**

